

March 27, 2003

U.S. Department of Transportation Dockets  
Docket No. FAA-2002-13458  
400 Seventh Street SW  
Room Plaza 401  
Washington, DC 20590

Subject: Corrosion Prevention and Control Program NPRM & Advisory  
Circular

To Whom It May Concern:

Alaska Airlines has reviewed docket no FAA-2002-13458 and associated documents which provide information and guidance to the proposed rulemaking that will ensure incorporation of a CPC program to those aircraft operated under part 121, part 129, and part 135 without a corrosion program.

The following are questions and comments raised during our review of the reference material.

1) Do the CPCP AD's meet all requirements of proposed rules?

If not, could the FAA clearly state what additional requirements must be met for full compliance with proposed rule, in addition to CPCP AD requirements?

2) Does the MSG-3 Rev. 2 maintenance programs (i.e. used for 737-NG and MD-80's) meet all corrosion tasks requirements of proposed rules?

If not, could the FAA clearly state what additional requirements must be met for full compliance with proposed rule, in addition to MSG-3 Rev. 2 maintenance programs corrosion tasks requirements?

3) There appears to be some contradiction between the CPCP AD's and the NPRM. AC-120-CPCP's note under paragraph 5.h. sets a requirement to adjust the operator's CPCP in cases where Level 2 corrosion is found during the initial inspection of OEM based corrosion programs. CPCP AD's do not have this requirement. The NPRM does not

clearly state if this AC's requirement applies although an operator is not mandated to adopt the AC's. (Request clarification)

4) NPRM states that there are no additional reporting requirements. Yet, it is implied (text in AC) that Level 2 and Level 3 corrosion found outside a CPCP inspection must be reported to the FAA. Is this requirement applicable only to operators adopting the AC, since adoption of AC is not mandatory?

Thank you for the opportunity to provide comments and if you have any questions or need additional information, please contact me at 206-392-9745.

Sincerely,

James C. Trimberger  
Director, Technical Compliance